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CLARK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANSET RODRIGUEZ,  
YANIRIS ALFONSO,  
JOSE MANUEL IGLESIAS,  
JUAN CARLOS BANOS,  
CARLOS RODRIGUEZ MARTINEZ,  
LESTER ENRIQUE CASTANEDA,  
EDELBERTO HERNANDEZ,  
EDDY PIMENTEL-VILA,  
LUIS ENRIQUE JIMENEZ GONZALES,  
YONASKY ROSA,  
YADIAN QUESADA-HERNANDEZ, and  
ALEJANDRO MOISES,

Defendants.

INDICTMENT

JUDGE GAUGHAN

CASE NO. 1:17 CR 417

Title 18, Sections 371,  
1029(a)(2), 1029(a)(3),  
1029(a)(4); 1028A(a)(1) and 2,  
United States Code

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO, ALEJANDRO MOISES, LUIS ENRIQUE JIMENEZ GONZALES, LESTER ENRIQUE CASTANEDA, YADIAN QUESADA-HERNANDEZ and YONASKY ROSA were residents of Florida.
2. Defendants EDDY PIMENTEL-VILA and JOSE MANUEL IGLESIAS were residents of New Jersey.

3. Defendants EDELBERTO HERNANDEZ and CARLOS RODRIGUEZ MARTINEZ were residents of Colorado.

4. Defendant JUAN CARLOS BANOS was a resident of Ohio.

5. A “skimmer” is an electronic device which can be attached to a point-of-sale credit card reader to covertly copy account information and other data stored on the magnetic strip of a credit or debit card during the payment authorization function which occurs between a merchant and the issuing financial institution during a retail transaction. Credit and debit card account information stored on the skimmer is subsequently copied or transmitted to a computer, either directly, or through a wireless connection.

6. A “credit card reader/writer/encoder” is an electronic device designed to read and rewrite the electronic data contained on the magnetic strip of a credit or debit card. These devices are capable of reading, decoding, verifying and rewriting data on all three “tracks” contained within the magnetic strips on credit cards, debit cards, loyalty cards, gift cards, employee ID cards and electronic hotel room keys. “Track data” includes the cardholder’s full name, credit card number, primary account number, card expiration date and country code.

7. A “credit card reader” is similar to a “credit card reader/writer/encoder” but can only read the data contained on the magnetic strip on a credit card or similar type card. When connected to a computer, a card reader enables the user to view and store account and other data contained on the magnetic strip on the card.

8. A “means of identification” means any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a person’s name, Social Security Account number, date of birth, or state or government issued driver’s license or identification number.

9. As defined in Title 18, United States Code, Section 1029(e):

(a) “Access Device” includes any card, plate, code, account number, electronic serial number, personal identification number or other means of account access that can be used alone or in conjunction with another access device to obtain money, goods, services, or any other thing of value, or that can be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument);

(b) “Counterfeit access device” means any access device that is counterfeit, fictitious, altered, or forged, or an identifiable component of an access device or a counterfeit access device;

(c) “Unauthorized access device” means any access device that is lost, stolen, expired, revoked, cancelled or obtained with the intent to defraud;

(d) “Produce” includes design, alter, authenticate, duplicate or assemble;

(e) “Traffic” means transfer, or otherwise dispose of, to another, or obtain control of with intent to transfer or dispose of;

(f) “Device making equipment” means any equipment, mechanism, or impression designed or primarily used for making an access device or a counterfeit access device.

COUNT 1

The Grand Jury charges:

10. Paragraphs 1 through 9 of the General Allegations are incorporated herein and realleged by reference.

THE CONSPIRACY

11. Beginning in or before August 2014, and continuing until in or about July 2017, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with each other, and with others both known and unknown to the Grand Jury, to commit the following offenses against the United States, to wit:

(a) to knowingly and with the intent to defraud, traffic in and use, and attempt to traffic in and use, one or more unauthorized access devices during any one year period, and by such conduct obtain anything of value aggregating \$1,000 or more during that period, such conduct affecting interstate or foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2);

(b) to knowingly and with intent to defraud, possess fifteen or more devices which are counterfeit or unauthorized access devices, in violation of Title 18, United States Code, Section 1029(a)(3);

(c) to knowingly and with the intent to defraud, produce, traffic in, have control or custody of, and possess device making equipment, in violation of Title 18, United States Code, Section 1029(a)(4);

(d) to knowingly transfer, possess and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated

in Title 18, United States Code, Section 1028A(c), knowing that the means of identification was that of another person, in violation of Title 18, United States Code, Section 1028A(a)(1).

OBJECT OF THE CONSPIRACY

12. It was the object of the conspiracy that defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, enriched themselves and others by: (i) fraudulently installing and causing the installation of electronic skimmer devices connected to point-of-sale terminals on gas station pumps thereby obtaining credit card and/or debit card account information, and other personal information encoded on credit/debit card magnetic strips; (ii) subsequently re-encoding the stolen credit/debit card account data and other information onto the counterfeit access devices' magnetic strips; and (iii) using and attempting to use the re-encoded counterfeit and unauthorized access devices to fraudulently obtain gift cards, merchandise, goods, services and other things of value in the Northern District of Ohio, Eastern Division, and elsewhere.

MANNER AND MEANS

13. It was part of the conspiracy that defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, and others unknown to the Grand

Jury, procured and/or manufactured electronic skimmers and card readers/writers, that is, devices capable of reading/writing/recording the magnetic information contained on the back of credit/debit cards, including the names and account numbers of the actual cardholders.

14. It was further part of the conspiracy that defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, and others known and unknown to the Grand Jury traveled from Florida to Ohio, Colorado, Maryland, Utah, and elsewhere, to covertly install the electronic skimmer devices on the point-of-sale terminals of gas station pumps to fraudulently capture the magnetic data on credit and debit cards used by cardholders.

15. It was further part of the conspiracy that defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, and others unknown to the Grand Jury, used various vehicles to shield the gas station pumps from the view of the public and/or from the view of gas station employees working inside the gas station building.

16. It was further part of the conspiracy that defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO

HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, and others unknown to the Grand Jury entered the stores of the targeted gas stations and purchased goods or otherwise distracted the gas station employees during the installation of the skimmers.

17. It was further part of the conspiracy that defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, and others unknown to the Grand Jury later retrieved the electronic skimmer devices from the gas station pumps, and downloaded the stolen magnetic credit and debit card account information onto computers or other electronic storage media such as smart-phones, tablets or portable storage media.

18. It was further part of the conspiracy that defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, and others unknown to the Grand Jury subsequently re-encoded the stolen credit and debit card account information and other personal data onto counterfeit or unauthorized access devices.

19. It was further part of the conspiracy that defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO



HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, and others unknown to the Grand Jury fraudulently used and attempted to use the counterfeit or unauthorized access devices to obtain gift cards, merchandise, goods, services and other things of value.

OVERT ACTS

20. In furtherance of the conspiracy, and to effect the objects thereof, on or about the following dates, the defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, and others unknown to the Grand Jury, committed various overt acts within the Northern District of Ohio, Eastern Division, and elsewhere, including, but not limited to, the following:

(a) Beginning on a date unknown to the Grand Jury, but believed to be as early as August 2014, and continuing until at least June 2016, Defendants RANSET RODRIGUEZ and YANIRIS ALFONSO purchased approximately 112 credit card readers from a distributor in California through 29 separate transactions. The billing address used was an address associated with Defendant RANSET RODRIGUEZ in Hialeah, Florida. The card readers were shipped to various locations throughout the United States, including one or more locations in the Northern District of Ohio, Eastern Division.



(b) Between on or about February 18, 2015, and on or about February 28, 2015, Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO and CARLOS RODRIGUEZ MARTINEZ, in the District of Colorado, conducted and aided and abetted one or more retail transactions using counterfeit access devices re-encoded with stolen credit/debit card account information (including the true account holders' names).

(c) Between on or about February 24, 2015 and on or about February 26, 2015, Defendant YANIRIS ALFONSO in furtherance of the objects of the conspiracy conducted a retail transaction in Aurora, Colorado, using a debit card associated with a TD Bank account ending in 3509 maintained in her own name.

(d) Between on or about July 20, 2015, and on or about August 1, 2015, Defendants RANSET RODRIGUEZ and YANIRIS ALFONSO traveled to the Northern District of Ohio, Eastern Division, and engaged in various retail transactions in Middleburg Heights and Fairview Park, Ohio, using counterfeit access devices re-encoded with stolen credit/debit account information (including the true account holders' names).

(e) Between on or about August 14, 2015, and on or about August 15, 2015, in Willoughby, Ohio, CS1 and CS2, (known to the Grand Jury but not charged herein), possessed with the intent to defraud approximately 37 counterfeit access devices re-encoded with stolen credit/debit account information (including the true account holders' names). RANSET RODRIGUEZ AND YANIRIS ALFONSO recruited CS1 and CS2 into the conspiracy and provided CS1 and CS2 with counterfeit access devices, the card reader/encoder equipment and credit card skimmers found in CS1 and CS2's possession in the Northern District of Ohio, Eastern Division on or about August 15, 2015.

(f) Between on or about February 11, 2016, and on or about March 24, 2016, airline and/or cellular phone records indicate that Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO and CARLOS RODRIGUEZ MARTINEZ were present in Colorado, Ohio and elsewhere.

(g) On or about March 24, 2016, in the District of Colorado, in furtherance of the conspiracy, CARLOS RODRIGUEZ MARTINEZ knowingly possessed with intent to defraud approximately 22 counterfeit access devices re-encoded with stolen credit/debit card account information (including the true account holders' names), credit card skimming devices and a card reader/writer/encoder used to re-encode counterfeit access devices. Text messages found in CARLOS RODRIGUEZ MARTINEZ's phone between CARLOS RODRIGUEZ MARTINEZ and RANSET RODRIGUEZ contained photographs of a fraudulent Ohio driver's license bearing the name RANSET RODRIGUEZ, a diagram/ schematic of the wiring in a credit card skimmer device, and a list of stolen access device account numbers.

(h) On or about March 24, 2016, while being questioned by law enforcement authorities concerning the counterfeit credit cards, skimmer devices and card reader/encoder that he possessed, CARLOS RODRIGUEZ MARTINEZ tried to disable and/or destroy his laptop computer by pouring a glass of water onto the keyboard. Account information from approximately 361 stolen credit/debit card accounts was subsequently recovered from the laptop.

(i) On or about March 17, 2016, CS3 (known to the Grand Jury but not charged herein) traveled from Florida to the Northern District of Ohio to conduct credit card skimming activity and to use counterfeit access devices that were re-encoded with

stolen credit/debit card account information (including the true account holders' names). Defendant JOSE MANUEL IGLESIAS recruited CS3 into the conspiracy and directed CS3 to travel to Ohio to engage in such conduct.

(j) Between on or about March 10, 2016, and on or about March 21, 2016, Defendant RANSET RODRIGUEZ shipped, or caused the shipment of, a package in the name of RANSET RODRIGUEZ that contained credit card skimming devices to a motel room in Macedonia, Ohio. According to bank records and cellular phone records, Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS were in the Northern District of Ohio during this time.

(k) On or about March 19, 2016, skimmer devices were found on gasoline pumps in Rocky River, Solon, Stow and Hudson, Ohio. Cellular phone records indicate that during the week of March 19, 2016, Defendants RANSET RODRIGUEZ and YANIRIS ALFONSO had been at or near the gas stations where skimmers were discovered.

(l) On or about March 21, 2016, skimmer devices were discovered on gas pumps in Fairview Park, Ohio. Cellular phone records indicate that RANSET RODRIGUEZ and JOSE MANUEL IGLESIAS were at or near the gas station in the preceding days.

(m) Between on or about March 21, 2016, and on or about March 30, 2016, Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS conducted various retail transactions in the Northern District of Ohio using counterfeit access devices which had been re-encoded with stolen credit/debit account

information (including the true account holders' names) that had been obtained from skimmer devices.

(n) Between on or about March 21, 2016, and on or about March 28, 2016, Defendants LESTER ENRIQUE CASTANEDA and YANIRIS ALFONSO traveled by airline between Florida and Cleveland, Ohio, to engage in acts in furtherance of the conspiracy.

(o) On or about March 28, 2016, Defendant JOSE MANUEL IGLESIAS traveled from Florida to Ohio to engage in activity in furtherance of the conspiracy. On the same date, JOSE MANUEL IGLESIAS conducted and attempted to conduct retail transactions at a Target Store located in Avon, Ohio, using a counterfeit access device re-encoded with stolen credit/debit account information for account 5845 (including the true account holder's name) that had been obtained from a skimmer installed on a point of sale terminal inside a gas pump.

(p) On or about April 4, 2016, Defendant JOSE MANUEL IGLESIAS in the Northern District of Ohio, Eastern Division, installed a skimmer device on the point of sale terminal inside a gas pump located at a Circle K Gas Station in Fairview Park, Ohio. Cellular phone records place Defendant JOSE MANUEL IGLESIAS at or near the location on April 4, 2016. The skimmer device was discovered on the gas pump by an employee on or about April 15, 2016.

(q) On or about April 4, 2016, Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO and LESTER ENRIQUE CASTANEDA traveled by airline from Florida to Cleveland, Ohio, to engage in conduct in furtherance of the conspiracy.

(r) Between on or about April 4, 2016, and on or about April 10, 2016, an unknown member of the conspiracy conducted retail transactions at Target stores, Home Depot and Circle K stores in Cuyahoga Falls, Euclid, North Canton and Fairview Park, Ohio, using counterfeit access devices re-encoded with stolen credit/debit account information (including the true account holders' names) that had been obtained from a skimmer device installed on the point of sale terminal inside a gas pump.

(s) On or about April 14, 2016, Defendants RANSET RODRIGUEZ and YANIRIS ALFONSO traveled by airline from Florida to Cleveland, Ohio, to engage in conduct in furtherance of the conspiracy.

(t) On or about April 18, 2016, Defendant RANSET RODRIGUEZ and an unidentified member of the conspiracy conducted and attempted to conduct retail transactions at a Target store located in Fairview Park, Ohio, using counterfeit access devices re-encoded with stolen credit/debit account information (including the true account holders' names) that had been obtained from a skimmer device installed on the point of sale terminal inside of a gas pump.

(u) On or about April 18, 2016, Defendant RANSET RODRIGUEZ conducted an ATM transaction on a TD Bank account maintained in his own name, ending in 0153, in Cleveland, Ohio.

(v) On or about April 19, 2016, Defendants RANSET RODRIGUEZ and YANIRIS ALFONSO conducted and attempted to conduct retail transactions at a Target store located in the Steelyard Commons Shopping Center in Cleveland, Ohio, using counterfeit access devices re-encoded with credit/debit account information (including

the true account holders' names) that had been obtained from a skimmer device installed on the point of sale terminal inside a gas pump.

(w) On or about April 17, 2016, unknown members of the conspiracy installed a skimmer device on the point of sale terminal inside a gas pump at the Circle K Gas Station, 16550 Keystone Boulevard, Parker, Colorado. The skimmer was discovered by employees on or about April 19, 2016.

(x) Between on or about April 18, 2016, and on or about April 19, 2016, Defendant EDELBERTO HERNANDEZ and another member of the conspiracy conducted and attempted to conduct one or more retail transactions at the Circle K store in Parker, Colorado, using counterfeit access devices re-encoded with stolen credit/debit account information (including the true account holders' names) that had been obtained from a skimmer device installed on the point of sale terminal inside of a gas pump.

(y) On or about May 12, 2016, Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS along with other members of the conspiracy working under the direction of Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS traveled from Florida to Colorado to engage in conduct in furtherance of the conspiracy.

(z) On or about May 12, 2016, members of the conspiracy checked into rooms at a Hilton Garden Inn motel in Castle Rock, Colorado, which were reserved in the name RANSET RODRIGUEZ. Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO, and JOSE MANUEL IGLESIAS and other members of the conspiracy had the following items in their possession for use in furtherance of the conspiracy: an iPad, a laptop computer, approximately 225 counterfeit access devices bearing the names RANSET

RODRIGUEZ and Roberto Perez, a skimmer device, 3 flash drives, heat shrink tubing, a soldering gun, a glue gun, and other supplies use in the production or skimmer devices. Cellular phone records indicate that Defendants RANSET RODRIGUEZ and JOSE MANUEL IGLESIAS were at or near the motel on or about May 12, 2016 and on or about May 13, 2016.

(aa) Between on or about June 7, 2016, and on or about July 10, 2016, Defendant YANIRIS ALFONSO rented five different vehicles from Fox Car rental in Denver, Colorado, which vehicles were used in furtherance of the conspiracy.

(bb) On or about July 5, 2016, Defendant RANSET RODRIGUEZ rented a room at Doubletree Motel in Thornton, Colorado using a debit card associated with a Wells Fargo account ending in 4735 and maintained in his own name. Airline records indicate that on or about July 7, 2016, Defendants RANSET RODRIGUEZ and YANIRIS ALFONSO traveled from Florida to Colorado to engage in activity in furtherance of the conspiracy.

(cc) On or about July 8, 2016, a skimmer device was found on a gas pump at the Conoco Station located at 191 McCaslin Boulevard, Superior, Colorado.

(dd) Between on or about July 13, 2016, and on or about July 18, 2016, Defendant JOSE MANUEL IGLESIAS rented a room in his own name at the Super 8 Motel at 58th and Broadway in Denver, Colorado. Cellular phone records indicate that Defendants JOSE MANUEL IGLESIAS and RANSET RODRIGUEZ were at or near the Super 8 Motel during this time period.

(ee) Between on or about July 7, 2016, and on or about July 20, 2016, Defendant JOSE MANUEL IGLESIAS and other members of the conspiracy, working at



the direction of Defendants RANSET RODRIGUEZ and YANIRIS ALFONSO, conducted and attempted to conduct approximately 133 retail transactions totaling in excess of \$27,000 at approximately 26 different locations in or near Boulder, Colorado, using approximately 90 counterfeit access devices re-encoded with credit/debit account information (including the true account holders' names) that were obtained by a skimming device placed on the point of sale terminal of a gas pump.

(ff) Between on or about July 8, 2016, and on or about July 25, 2016, Defendant RANSET RODRIGUEZ conducted and attempted to conduct retail transactions in Denver, Westminster, and Aurora, Colorado, using an access device associated with a TD Bank account ending in 0153 and maintained in his own name. Defendant RANSET RODRIGUEZ also used an access device associated with a Wells Fargo account ending in 4735 and maintained in his own name to rent a car in Denver, Colorado. During this same time period, Defendant YANIRIS ALFONSO conducted a Western Union transaction from Aurora, Colorado, to Mexico.

(gg) On or about July 20, 2016, members of the conspiracy were arrested in Boulder, Colorado while attempting to conduct retail transactions with counterfeit access devices. At the time of their arrest, the members of the conspiracy had the following items in their possession for use in furtherance of the conspiracy: a Garmin GPS navigation device, an iPad mini, approximately 51 counterfeit access devices re-encoded with stolen credit/debit account information (including the names of the true account holders), and numerous gift cards and other merchandise purchased with counterfeit access devices.

(hh) On or about August 22, 2016, Defendant EDELBERTO HERNANDEZ and other members of the conspiracy conducted and attempted to conduct retail transactions totaling approximately \$3,820.74 at American Furniture Warehouse, 1700 S. Abilene, Castle Rock, Colorado, using counterfeit access devices which were re-encoded with credit/debit card account information (including the true account holders' names) that had been obtained by a skimming device installed on the point of sale terminal of one or more gasoline pumps.

(ii) On or about September 9, 2016, Defendant JOSE MANUEL IGLESIAS knowingly possessed a skimmer device, which he attempted to install on the point of sale terminal inside a gasoline pump at a gas station in Strongsville, Ohio. Defendant JOSE MANUEL IGLESIAS was apprehended while attempting to flee from police at the gas station.

(jj) On or about September 14, 2016, Defendant RANSET RODRIGUEZ traveled from Florida to Cleveland, Ohio, to engage in conduct in furtherance of the conspiracy including the installation of skimmer devices on point of sale terminals inside gas pumps at various gas stations, including a skimmer device recovered from the Circle K Station, 3809 Pearl Road, Medina, Ohio, which contained the DNA of Defendant RANSET RODRIGUEZ.

(kk) Between on or about September 14, 2016, and on or about September 15, 2016, Defendant RANSET RODRIGUEZ conducted and attempted to conduct various retail transactions and ATM transactions in the Northern District of Ohio using an access device associated with a TD Bank account maintained in his own name and ending in 0153, before returning to Florida on or about September 15, 2016.

(ll) Between on or about December 5, 2016, and on or about December 13, 2016, Defendants RANSET RODRIGUEZ, YANIRIS ALFONSO, LESTER ENRIQUE CASTANEDA and EDELBERTO HERNANDEZ were present in Colorado to engage in conduct in further of the conspiracy, including renting a car, and conducting and attempting to conduct retail transactions using counterfeit access devices re-encoded with credit/debit account information (including the true account holders' names) that had been obtained from skimmer devices installed on point of sale terminals inside gas pumps. Defendant RANSET RODRIGUEZ also conducted one or more retail transactions using an access device associated with a TD Bank account ending in 0153 and maintained in his own name.

(mm) Between on or about February 8, 2017, and on or about March 1, 2017, members of the conspiracy were present in Colorado to engage in conduct in furtherance of the conspiracy, including the installation of at least four skimmer devices on gas pumps located on Smoky Hill Road and South Parker Road, Aurora, Colorado. During the same time period, Defendant ALEJANDRO MOISES and other members of the conspiracy conducted and attempted to conduct retail transactions using counterfeit access devices re-encoded with credit/debit account information (including the true account holders' names) that had been obtained from said skimmer devices.

(nn) Between on or about February 8, 2017, and on or about February 14, 2017, Defendant RANSET RODRIGUEZ used an access device associated with a TD Bank account ending in 0153 and maintained in his own name to rent a car in Denver, Colorado, and to rent a motel room at Holiday Inn in Aurora, Colorado.

(oo) Between on or about March 22, 2017, and on or about April 10, 2017, Defendants RANSET RODRIGUEZ and YANIRIS ALFONSO and other members of the conspiracy were present in the Northern District of Ohio to engage in conduct in furtherance of the conspiracy, including installation of skimmer devices on point of sale terminals inside gas pumps in Canton, Norton and Cuyahoga Falls, Ohio. DNA of Defendant RANSET RODRIGUEZ was found on skimmer devices recovered from gas pumps located in Canton and Cuyahoga Falls, Ohio, during this time period.

(pp) Between March 22, 2017, and on or about April 10, 2017, in the Northern District of Ohio, Eastern Division, Defendant EDDY PIMENTEL-VILA and other members of the conspiracy conducted and attempted to conduct retail transactions using counterfeit access devices re-encoded with credit/debit account information (including the true account holders' names) that were obtained from skimmer devices installed inside gas pumps, including transactions that were conducted and attempted to be conducted in Cuyahoga Falls, Wadsworth, and Fairlawn, Ohio.

(qq) Between on or about March 22, 2017, and on or about April 10, 2017, Defendant RANSET RODRIGUEZ conducted and attempted to conduct retail transactions in Bath, Fairlawn, Canton, Northfield, Middleburg Heights and Cuyahoga Falls, Ohio, using an access device associated with a TD Bank account ending in 0153 and maintained in his own name.

(rr) On or about March 28, 2017, Defendant JUAN CARLOS BANOS and another member of the conspiracy opened a gas pump and removed or attempted to remove a skimmer device on said gas pump located at the Circle K Station, 13933 Lakewood Heights Boulevard, Cleveland, Ohio.

(ss) On or about April 8, 2017, Defendant LESTER ENRIQUE CASTANEDA traveled to Aurora, Colorado, for the purpose of engaging in conduct in furtherance of the conspiracy, including the installation of one or more skimmer devices on gas pumps to fraudulently collect credit/debit account information (including true account holders' names) during retail transactions. On April 10, 2017, DNA belonging to Defendant LESTER ENRIQUE CASTANEDA was found on two skimmer devices installed on a gas pump at The Corner Store, 1110 S. Buckley Road, Aurora, Colorado.

(tt) Between on or about April 27, 2017, and on or about May 1, 2017, Defendants LUIS ENRIQUE JIMENEZ GONZALEZ and LESTER ENRIQUE CASTANEDA traveled to Salt Lake City, Utah, to engage in conduct in furtherance of the conspiracy, including installing skimming devices on gas pumps, re-encoding counterfeit access devices with stolen credit/debit account information (including the true account holders' names), and conducting and attempting to conduct retail transactions using with the counterfeit access devices. During this time, Defendants possessed approximately 13 skimmer devices, a card reader/writer/encoded, three laptop computers, and approximately 30 counterfeit access devices re-encoded with stolen credit/debit card account information (including the true account holders' names).

(uu) Between on or about June 2, 2017, and on or about July 3, 2017, Defendants RANSET RODRIGUEZ, EDDY PIMENTEL-VILA and JOSE MANUEL IGLESIAS traveled to Maryland and engaged in conduct in furtherance of the conspiracy, including installing skimmer devices on point of sale terminals inside gas pumps, downloading the stolen credit/debit account information (including the true account holders' names), re-encoding the stolen account information onto counterfeit

access devices, and using and attempting to use the counterfeit access devices to conduct and attempt to conduct various retail transactions.

(vv) On or about July 3, 2017, in Edgewood, Maryland, Defendants RANSET RODRIGUEZ, EDDY PIMENTEL-VILA and JOSE MANUEL IGLESIAS, to further the objectives of the conspiracy, knowingly possessed the following items: skimmer devices, laptop computers, iPad, credit card reader/encoder/writer devices, approximately 78 counterfeit access devices re-encoded with stolen credit/debit account information (including the true account holders' names), cloned credit/debit cards, fraudulent identification documents/cards bearing Defendants' photos, approximately 1,940 stolen credit/debit card account information in electronic format, and gift cards purchased with counterfeit access devices.

(ww) On or about July 13, 2017, Defendants YADIAN QUESADA-HERNANDEZ and YONASKY ROSA, acting at the direction of Defendant JUAN CARLOS BANOS, installed a skimmer device on the point of sale terminal inside a gas pump at the Pilot Gas Station, 1150 North Canfield-Niles Road, Austintown, Ohio. The skimmer device was subsequently removed by law enforcement officials on July 14, 2017.

(xx) On or about July 14, 2017, in Parma, Ohio, Defendants JUAN CARLOS BANOS, YADIAN QUESADA-HERNANDEZ and YONASKY ROSA, to further the objectives of the conspiracy, knowingly possessed the following items: approximately 55 counterfeit access devices re-encoded with credit/debit account information (including the true account holders' names) obtained from skimmer devices installed on point of

sale terminals in gas pumps, a laptop computer, two thumb drives, a card reader/writer/encoder, a skimmer device, and a soldering iron.

(yy) On or about July 14, 2017, in Strongsville, Ohio, Defendants YADIAN QUESADA-HERNANDEZ and YONASKY ROSA conducted and attempted to conduct retail transactions with counterfeit access devices re-encoded with credit/debit account information (including the true account holders' names) that were obtained from skimming devices installed on point of sale terminals inside gas pumps.

(zz) On or about July 14, 2017, in Strongsville, Ohio, Defendants YADIAN QUESADA-HERNANDEZ and YONASKY ROSA and other members of the conspiracy knowingly possessed approximately 19 counterfeit access devices re-encoded with stolen credit/debit account information (including the true account holders' names).

All in violation of Title 18, United States Code, Section 371.

#### COUNT 2

The Grand Jury further charges:

On or about August 14, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, RANSET RODRIGUEZ, with the intent to defraud, did knowingly possess, and knowingly aid and abet the possession of, 15 or more devices which were counterfeit or unauthorized access devices, as defined in Title 18, United States Code, §§ 1029(e)(2) and (e)(3), said conduct affecting interstate and foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(3) and 2.



COUNT 3

The Grand Jury further charges:

Between on about February 11, 2016, and on or about March 24, 2016, in the Northern District of Ohio, Eastern Division, the District of Colorado, and elsewhere, defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO and CARLOS RODRIGUEZ MARTINEZ, with the intent to defraud, did knowingly possess, and did knowingly aid and abet the possession of, 15 or more devices which were counterfeit or unauthorized access devices, as defined in Title 18, United States Code, §§ 1029(e)(2) and (e)(3), said conduct affecting interstate and foreign commerce, all in violation of Title 18, United States Code §§ 1029(a)(3) and 2.

COUNT 4

The Grand Jury further charges:

On or about May 12, 2016, in the Northern District of Ohio, Eastern Division, the District of Colorado, and elsewhere, defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS, with the intent to defraud, did knowingly possess, and did knowingly aid and abet the possession of, 15 or more devices which were counterfeit or unauthorized access devices, as defined in Title 18, United States Code, §§ 1029(e)(2) and (e)(3), said conduct affecting interstate and foreign commerce, all in violation of Title 18, United States Code §§ 1029(a)(3) and 2.

COUNT 5

The Grand Jury further charges:

Between on about April 27, 2017, and on or about May 1, 2017, in the Northern District of Ohio, Eastern Division, the District of Utah, and elsewhere, defendants, LUIS ENRIQUE JIMENEZ GONZALEZ and LESTER ENRIQUE CASTANEDA, with the intent to defraud, did

knowingly possess, and did knowingly aid and abet the possession of, 15 or more devices which were counterfeit or unauthorized access devices, as defined in Title 18, United States Code, §§ 1029(e)(2) and (e)(3), said conduct affecting interstate and foreign commerce, all in violation of Title 18, United States Code §§ 1029(a)(3) and 2.

COUNT 6

The Grand Jury further charges:

On or about July 3, 2017, in the Northern District of Ohio, Eastern Division, the District of Maryland, and elsewhere, defendants, RANSET RODRIGUEZ, JOSE MANUEL IGLESIAS, ALEJANDRO MOISES and EDDY PIMENTEL-VILA, with the intent to defraud, did knowingly possess, and did knowingly aid and abet the possession of, 15 or more devices which were counterfeit or unauthorized access devices, as defined in Title 18, United States Code, §§ 1029(e)(2) and (e)(3), said conduct affecting interstate and foreign commerce, all in violation of Title 18, United States Code §§ 1029(a)(3) and 2.

COUNT 7

The Grand Jury further charges:

On or about July 14, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants, JUAN CARLOS BANOS, YADIAN QUESADA-HERNANDEZ and YONASKY ROSA, with the intent to defraud, did knowingly possess, and did knowingly aid and abet the possession of, 15 or more devices which were counterfeit or unauthorized access devices, as defined in Title 18, United States Code, §§ 1029(e)(2) and (e)(3), said conduct affecting interstate and foreign commerce, all in violation of Title 18, United States Code §§ 1029(a)(3) and 2.

COUNT 8

The Grand Jury further charges:

On or about July 14, 2017, in the Northern District of Ohio, Eastern Division and elsewhere, defendants, JUAN CARLOS BANOS, YADIAN QUESADA-HERNANDEZ and YONASKY ROSA, with the intent to defraud, did knowingly possess, and did knowingly aid and abet the possession of, 15 or more devices which were counterfeit or unauthorized access devices, as defined in Title 18, United States Code, §§ 1029(e)(2) and (e)(3), said conduct affecting interstate and foreign commerce, all in violation of Title 18, United States Code §§ 1029(a)(3) and 2.

COUNT 9

The Grand Jury further charges:

Between on or about February 18, 2015, and on or about February 26, 2015, in the Northern District of Ohio, Eastern Division, the District of Colorado, and elsewhere, defendants, RANSET RODRIGUEZ and YANIRIS ALFONSO, did knowingly and with the intent to defraud, traffic in and use, and did knowingly aid and abet the trafficking and use of one or more unauthorized access devices during any one-year period, and by such conduct did obtain goods and services valued at \$1,000 or more during that period, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(2) and 2.

COUNT 10

The Grand Jury further charges:

Between on or about July 20, 2015, and on or about August 1, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, defendants, RANSET RODRIGUEZ and YANIRIS ALFONSO, did knowingly and with the intent to defraud, traffic in and use, and did

knowingly aid and abet the trafficking and use of one or more unauthorized access devices during any one-year period, and by such conduct did obtain goods and services valued at \$1,000 or more during that period, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(2) and 2.

COUNT 11

The Grand Jury further charges:

Between on or about March 19, 2016, and on or about March 30, 2016, in the Northern District of Ohio, Eastern Division and elsewhere, defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS, did knowingly and with the intent to defraud, traffic in and use, and did knowingly aid and abet the trafficking and use of one or more unauthorized access devices during any one-year period, and by such conduct did obtain goods and services valued at \$1,000 or more during that period, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(2) and 2.

COUNT 12

The Grand Jury further charges:

On or about April 19, 2016, in the Northern District of Ohio, Eastern Division and elsewhere, defendants, RANSET RODRIGUEZ and YANIRIS ALFONSO, did knowingly and with the intent to defraud, traffic in and use, and did knowingly aid and abet the trafficking and use of one or more unauthorized access devices during any one-year period, and by such conduct did obtain goods and services valued at \$1,000 or more during that period, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(2) and 2.

COUNT 13

The Grand Jury further charges:

Between on or about July 7, 2016, and on or about July 20, 2016, in the Northern District of Ohio, Eastern Division, the District of Colorado, and elsewhere, defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS, did knowingly and with the intent to defraud, traffic in and use, and did knowingly aid and abet the trafficking and use of one or more unauthorized access devices during any one-year period, and by such conduct did obtain goods and services valued at \$1,000 or more during that period, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(2) and 2.

COUNT 14

The Grand Jury further charges:

On or about August 22, 2016, in the Northern District of Ohio, Eastern Division, the District of Colorado, and elsewhere, defendant, EDELBERTO HERNANDEZ, did knowingly and with the intent to defraud, traffic in and use, and did knowingly aid and abet the trafficking and use of one or more unauthorized access devices during any one-year period, and by such conduct did obtain goods and services valued at \$1,000 or more during that period, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(2) and 2.

COUNT 15

The Grand Jury further charges:

On or about August 14, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, RANSET RODRIGUEZ, and others known to the Grand Jury but not

charged herein, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, §1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 16

The Grand Jury further charges:

Between on or about February 11, 2016, and on or about March 24, 2016, in the Northern District of Ohio, Eastern Division, the District of Colorado, and elsewhere, defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO and CARLOS RODRIGUEZ MARTINEZ, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 17

The Grand Jury further charges:

Between on or about March 10, 2016, and on or about March 17, 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the

production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 18

The Grand Jury further charges:

On or about March 21, 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants, RANSET RODRIGUEZ and JOSE MANUEL IGLESIAS, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, §1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 19

The Grand Jury further charges:

On or about May 12, 2016, in the Northern District of Ohio, Eastern Division, the District of Colorado, and elsewhere, defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO and JOSE MANUEL IGLESIAS, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.



COUNT 20

The Grand Jury further charges:

On or about September 14, 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, RANSET RODRIGUEZ, and others known to the Grand Jury but not charged herein, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 21

The Grand Jury further charges:

Between on or about March 22, 2017, and on or about April 10, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant, RANSET RODRIGUEZ, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 22

The Grand Jury further charges:

Between on or about April 8, 2017, and on or about April 10, 2017, in the Northern District of Ohio, Eastern Division, the District of Colorado, and elsewhere, defendant, LESTER ENRIQUE CASTANEDA, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 23

The Grand Jury further charges:

On or about July 3, 2017, in the Northern District of Ohio, Eastern Division, the District of Maryland, and elsewhere, defendants RANSET RODRIGUEZ, JOSE MANUEL IGLESIAS, ALEJANDRO MOISES, and EDDY PIMENTEL-VILA, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 24

The Grand Jury further charges:

On or about July 13, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, defendant JUAN CARLOS BANOS, YADIAN QUESADA-HERNANDEZ, and YONASKY ROSA, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 25

The Grand Jury further charges:

On or about July 14, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants, JUAN CARLOS BANOS, YADIAN QUESADA-HERNANDEZ and YONASKY ROSA, did knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device making equipment, as defined in Title 18, United States Code, § 1029(e)(6), and did knowingly aid and abet the production, trafficking in, having control and custody, and possessing device making equipment, namely, credit card skimmer devices, such conduct affecting interstate or foreign commerce, all in violation of Title 18, United States Code, §§ 1029(a)(4) and 2.

COUNT 26

The Grand Jury further charges:

Between in or about August 2014, and in or about July 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants, RANSET RODRIGUEZ, YANIRIS ALFONSO, JOSE MANUEL IGLESIAS, JUAN CARLOS BANOS, CARLOS RODRIGUEZ MARTINEZ, LESTER ENRIQUE CASTANEDA, EDELBERTO HERNANDEZ, EDDY PIMENTEL-VILA, LUIS ENRIQUE JIMENEZ GONZALES, YONASKY ROSA, YADIAN QUESADA-HERNANDEZ, and ALEJANDRO MOISES, during and in relation to felony violations of Title 18, United States Code, §§ 1029(a)(2), 1029(a)(3) and 1029(a)(4), knowingly transferred, possessed and used, without lawful authority, a means of identification of one or more other individuals, and knowingly aided and abetted the transfer, possession and use without lawful authority, of the means of identification of another person, knowing that said means of identification belonged to one or more other persons, all in violation of Title 18, United States Code, §§ 1028A(a)(1) and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.